

REMARKS

Claims 1-18 are pending. Claims 1, 5, 8, 12, and 16 are independent claims. Claims 1, 5, 6, 8, 12, and 14 are amended. Claims 16-18 are newly added. Support for these claim amendments, and new claim 16, can be found in at least paragraphs 23-25 of the Specification. Further support for new claim 16 is found in claim 1 and in at least paragraphs 32-33 of the Specification. Support for new claims 17-18 may be found in at least paragraphs 34 of the Specification.

In the Final Office Action dated April 20, 2007, all pending claims were rejected under 35 U.S.C. § 102(b) as allegedly anticipated by U.S. Patent No. 6,038,560 (“Wical”). The Board of Patent Appeals and Interferences affirmed these rejections in its Decision on Appeal dated June 3, 2011 (“Board Decision”). On July 28, 2011, Appellant filed a Request for Rehearing Under 37 C.F.R. § 41.52. The Board of Patent Appeals and Interferences denied this request in its Decision on Request for Rehearing dated October 3, 2011 (“Rehearing Decision”).

Applicants respectfully submit that none of the claims, as amended, are anticipated by Wical.

For example, the Board rejected Applicants’ argument that Wical fails to teach or suggest “Semantic Web structured resources,” finding that “the claims . . . fail to limit the scope of this term.” (Board Decision, page 5.) Independent claim 1 has been amended to further define “Semantic Web structured resources,” and now recites in part “identifying tagged statements in at least one Semantic Web structured resource, wherein the tagged statements each include subject/object/predicate triples.” Moreover, although the claims differ in scope, all of the other independent claims include similar recitations. Wical does not include any teaching or suggestion related to “tagged statements.” Therefore, for least this reason, all independent claims, as well as all of the claims depending therefrom, are allowable over Wical.

Further, the Board found that the recitation in claim 1 of “obtaining predicates, instances, types of said instances, and literal values of said related ones of said statements” “only requires the ‘literal value of said related ones of said statements,’” and therefore Wical’s disclosure of a value of “2” indicating that two documents are classified in a single category anticipated the foregoing recitation of claim 1. (Board Decision, pages 7-8; Rehearing Decision, pages 4-5.) Independent claim 1 now explicitly recites “wherein each of the predicates, instances, types of said instances,

and literal values is found in at least one of the at least one Semantic Web Structured resources.” Moreover, although the claims differ in scope, dependent claim 6, and independent claims 8, 12, and 16 include similar recitations. Wical does not include any teaching or suggestion of “obtaining predicates, instances, types of said instances, and literal values of said related ones of said statements, wherein each of the predicates, instances, types of said instances, and literal values is found in at least one of the at least one Semantic Web Structured resources.” Therefore, for least this further reason, claims 6, 8, 12, and 16, as well as all of the claims depending therefrom, are allowable over Wical.

Moreover, the Board disagreed with Applicants that the claims required “a first one-to-many relationship between a structured resource and its associated statements and a second one-to-many relationship between a single statement and its associated component words.” (Board Decision, page 6.) The Board also stated that because “each document [in Wical] has multiple themes associated to it and the processing of the document adds additional terms to themes, Wical describes a one-to-many relationship between structured resource, statements, and component words.” (Board Decision, page 7.) New independent claim 16 recites in part “parsing the tagged statements from the Semantic Web structured resources to identify component words, wherein, for each Semantic Web structured resource, there are a plurality of tagged statements, and for each tagged statement there are a plurality of component words.” Applicants respectfully submit that, even under the Board’s reasoning, Wical does not teach or suggest “a plurality of tagged statements” in “each Semantic Web structured resource,” because a document having multiple statements does not teach or suggest a structured resource having “a plurality of tagged statements.” Furthermore, Wical does not teach or suggest that “for each tagged statement there are a plurality of component words” because simply having statements to which terms are added does not amount to “a plurality of component words” for “each tagged statement.” Therefore, independent claim 16 is allowable over Wical for least these further reasons.

Additionally, the Board found that Wical’s alleged disclosure of “categorizing and classifying the themes of documents and arranging the classifications in a hierarchical structure in a knowledge base” anticipated the recitation in Applicants’ claims of an index relating component words to statements. (Board Decision, page 7.) Claim 16 further recites in part “constructing a

non-hierarchical index from said component words, said index relating said component words to said statements.” Applicants respectfully submit that Wical does not include any teaching or suggestion of a non-hierarchical categorization or classification, much less of a non-hierarchical index. Therefore, independent claim 16 is allowable over Wical for at least this further reason.

Accordingly, all rejections have been addressed.¹ In view of the above, the presently pending claims are believed to be in condition for allowance. Accordingly, reconsideration and allowance are respectfully requested and the Examiner is respectfully requested to pass this application to issue.

It is believed that any fees associated with the filing of this paper are identified in an accompanying transmittal. However, if any additional fees are required, they may be charged to Deposit Account 18-0013, under order number 65632-0218. To the extent necessary, a petition for extension of time under 37 C.F.R. 1.136(a) is hereby made, the fee for which should be charged against the aforementioned account.

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Respectfully submitted,

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¹ As Appellant’s remarks with respect to the Examiner’s rejections are sufficient to overcome these rejections, Appellant’s silence as to assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (e.g., whether a reference constitutes prior art, motivation to combine references, assertions as to dependent claims, etc.) is not a concession by Appellant that such assertions are accurate or such requirements have been met, and Appellant reserves the right to analyze and dispute such assertions/requirements in the future.